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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEMO ENDORSED

RICHARD A. WILLIAMSON, ON BEHALF
OF AND AS TRUSTEE FOR AT HOME
BONDHOLDERS' LIQUIDATING TRUST,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.,
VERIZON SERVICES CORP.,
VERIZON CORPORATE RESOURCES
GROUP LLC, VERIZON DATA SERVICES
LLC, VERIZON NEW YORK INC.,
AT&T INC., AT&T OPERATIONS, INC.,
AT&T SERVICES, INC.,

Defendants.

CIVIL ACTION

ECF CASE

Civil Action No. 1:11-cv-04948 (LTS)(HP)

**AT&T DEFENDANTS' NOTICE OF
MOTION FOR LEAVE TO FILE SUR-
REPLY IN OPPOSITION TO
PLAINTIFF'S MOTION TO AMEND
ITS INFRINGEMENT CONTENTIONS**

*The within motion for leave to file sur-reply
is granted.*

SO ORDERED:

[Signature] 8/9/13
HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

Defendants AT&T Operations, Inc. and AT&T Services, Inc. (collectively, "AT&T") file this Notice of Motion for Leave to File a Sur-reply in Opposition to Plaintiff's Motion to Amend Its Infringement Contentions. AT&T's Sur-reply in Opposition to Plaintiff's Motion to Amend is attached as Exhibit A.

Plaintiff presents two new arguments in his Reply. Plaintiff now argues that "no amount of due diligence would have discovered information sufficient to accuse AT&T's local ad insertion because it was not publicly available." AT&T's Sur-reply demonstrates how Plaintiff's argument is belied by the technical details at Plaintiff's disposal in the publicly available information. Furthermore, AT&T's Sur-reply addresses Plaintiff's new argument that infringement contentions against Verizon put AT&T on notice of accusations against AT&T's local ad insertion technology, an argument that flies in the face of common sense and the